

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 29, 2008

Name of company covered by this certification: Orbis1, LLC d/b/a CoStreet Communications

Form 499 Filer ID: 823400

Name of signatory: Patty Lail

Title of signatory: Chief Financial Officer

I, Patty Lail, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year, nor have any pretexters attempted to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in cursive script, reading "Patty Lail", written over a horizontal line.

**STATEMENT OF ORBIS1, LLC D/B/A COSTREET COMMUNICATIONS  
REGARDING COMPLIANCE WITH FEDERAL REQUIREMENTS  
GOVERNING USE AND PROTECTION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**

Orbis1, LLC d/b/a CoStreet Communications ("CoStreet") has implemented a number of procedures to protect customer information and to help ensure that CPNI is used and maintained consistent with the rules of the Federal Communications Commission (the "Commission").

As a general matter, employees of CoStreet are required to maintain the confidentiality of all information they obtain in connection with their employment, including customer-related information and CPNI. In addition, CoStreet has a CPNI protection policy that explains, among other things what constitutes CPNI, what requirements apply to the use and/or disclosure of CPNI, what type of authentication is required to validate inbound requests for CPNI, and what kinds of record-keeping and reporting obligations apply to CPNI. Employees receive training about the authorized uses of CPNI. Any employee who violates CoStreet's CPNI policies or otherwise violates their confidentiality obligations is subject to discipline, up to and including termination of employment.

Consistent with the Commission's rules, CoStreet uses, discloses, and permits access to CPNI without customer approval for the purposes of providing telecommunications services, billing and collecting for services rendered, protecting the Company's rights and property, and providing customer information required by a Public Safety Answering Point. CoStreet does not permit the use of CPNI for any marketing purposes whatsoever, and therefore does not collect opt-in or opt-out authorizations from customers for such use. Records of all other contacts with the customer (written or oral) are maintained in customer's account records for at least two years.

CoStreet has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. Only certain personnel within the company are authorized to discuss or provide CPNI to a customer in the context of providing services to that customer (*e.g.*, to take an order, resolve a billing question, or resolve a service trouble report). In turn, the personnel authorized to discuss CPNI with or provide CPNI to a customer are required to engage in proper authentication of inbound requests for communication of CPNI. CoStreet does not have access to call detail information through its provision of services. Where any changes are requested or created by a customer with respect to account information such as address of record, CoStreet sends notification of such changes to the prior contact of record or notifies the customer at the telephone number of record.

CoStreet Communications does not share, sell, lease and otherwise provide CPNI to any partner, vendor, contractor or third party agent for the purposes of marketing any services. To the extent that CoStreet intends to share CPNI with a partner, vendor, contractor or third party agent, the company will do so only after entering into a confidentiality agreement.

Through its policy and training, CoStreet has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of CPNI and the time

frames for such required by the Commission' s rules. CoStreet has provided all employees with contact information to help ensure that appropriate representatives receive rapid notification of any potential breaches, and CoStreet has informed its employees that records relating to any breaches must be maintained for at least two years.